

**CONTINUATION OF A CRIMINAL COMPLAINT**

I, Timothy Lessner, being duly sworn, state as follows:

**Introduction and Background**

1. This continuation is made in support of a criminal complaint to authorize the arrest of Kai Livingston PACKER for the following offenses:

- Distribution of fentanyl and aiding and abetting the same, on or about February 13, 2024, in Ottawa County, in the Southern Division of the Western District of Michigan and elsewhere, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2;
- Distribution of methamphetamine and aiding and abetting the same, on or about March 13, 2024, in Ottawa County, in the Southern Division of the Western District of Michigan and elsewhere, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2;
- Distribution of fentanyl and aiding and abetting the same, on or about April 29, 2024, in Ottawa County, in the Southern Division of the Western District of Michigan and elsewhere, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2; and,
- Distribution of methamphetamine and aiding and abetting the same, on or about August 2, 2024, in Ottawa County, in the Southern Division of the Western District of Michigan and elsewhere, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2.

This continuation is made for the limited purpose of establishing probable cause

and does not include each and every fact known by me or the government.

2. I am a Special Agent with the United States Drug Enforcement Administration, United States Department of Justice and have been so since August 2004. I am currently assigned to the Traverse City Post of Duty Office in the DEA's Detroit Field Division. During my time as a Special Agent, I have participated in investigations of unlawful drug trafficking and money laundering and, among other things, have conducted or participated in surveillance, the execution of search warrants, debriefings of informants, reviews of taped conversations and drug records, and have participated in investigations that included the interception of wire and electronic communications. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored, and distributed, the methods of payment for such drugs, the laundering of narcotics proceeds, and the dialect, lingo, and coded language used by narcotics traffickers. As a DEA Special Agent, I am charged with investigating controlled substance violations under Title 21, including charges of possession with intent to distribute controlled substances in violation of Title 21, United States Code, Section 841.

3. The information set forth in this criminal complaint is based on my personal knowledge gained from my participation in this investigation and my review of other law enforcement officers' reports, including reports of witness and suspect interviews.

4. I respectfully submit that the facts set forth in this criminal complaint establish probable cause to believe that KAI LIVINGSTON PACKER committed the

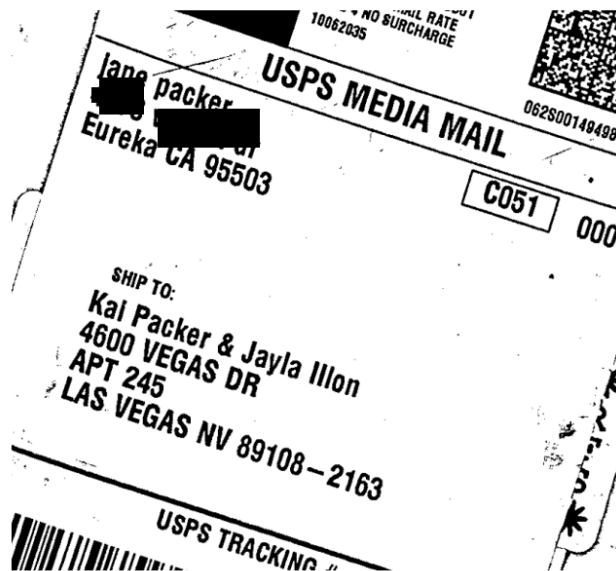
four offenses on or about the dates listed in paragraph 1 by shipping controlled substances to an undercover agent of the Drug Enforcement Administration (DEA) that were received by the investigators in Ottawa County, Michigan.

### **FACTS ESTABLISHING PROBABLE CAUSE**

5. PACKER is a 23-year-old male with a date of birth of January [REDACTED] 2001. Investigators know that PACKER is at least a part-time resident of Las Vegas, Nevada based on surveillance and postal packages addressed to PACKER in Las Vegas. PACKER has also been associated with addresses in Portland, Oregon, as further described below. PACKER's current driver's license is from Oregon and his home address on his driver's license returns to an apartment in Portland, Oregon. As of July 25, 2024, surveillance agents have associated PACKER with the address 4600 Vegas Drive, Apartment 107, Las Vegas, Nevada. HSI investigators also identified PACKER's previous address as 4600 Vegas Drive, Apartment 245, Las Vegas, Nevada. The previous address is in the same apartment complex, simply a different apartment. This information was confirmed by surveillance agents and U.S. Postal Packages to PACKER and PACKER's confirmed aliases, as further described in this continuation.



Surveillance photo of PACKER on July 25, 2024, utilizing the address of 4600 Vegas Drive, Apt. 107, Las Vegas, Nevada



An image provided by the U.S. Postal Inspection Service of a package mailed from PACKER's grandmother to PACKER and his girlfriend, Jayla Iilon Sutton at 4600 Vegas Dr., Apt. 245.

6. The investigation of PACKER has determined that PACKER uses the following aliases, monikers, and social media accounts: Joshua PRYOR, Joseph Malik LIVINGSTON, packoutexotics (Instagram account), mrpackout2.0 (Snapchat account), DK4MERE (Instagram account), Pack In again (Telegram account), packout40 (Telegram account), and \$Jojolivin09 (Cash App \$Cashtag).

7. Jayla Iilon Sutton is PACKER's girlfriend. The investigation has determined that they live together. I mention Sutton in this continuation because accounts linked to her have received payments for certain drug transactions to include the first DEA undercover purchase of fentanyl pills that were received in Ottawa County, Michigan on or about February 13, 2024.

8. PACKER came to the attention of law enforcement in Michigan after responding to the overdose death of O.N. on February 21, 2023 in Sault Ste. Marie, Michigan and obtaining evidence from O.N.'s phone.

#### **Overdose Death of O.N.**

9. On February 21, 2023, the Sault Ste. Marie, Michigan City Police Department responded to a residence for a reported unresponsive subject, O.N. Upon arriving at the residence, officers discovered O.N. was deceased. O.N. will hereafter be referred to as "Decedent." The cause of death was from fentanyl intoxication. The Decedent was found to have several blue pills embossed with "M-30" on his person. Subsequent testing of these pills confirmed the presence of fentanyl. Investigators from Tri-County Drug Enforcement Task Force (TRIDENT) and Homeland Security

Investigations (HSI) in Sault Ste. Marie, Michigan initiated an investigation. Investigators ultimately identified PACKER as the source of supply of M-30 pills that were obtained by the Decedent prior to his death.

**Identification of Kai LIVINGSTON PACKER as Decedent's Source of Fentanyl Pills**

10. Following the overdose death, law enforcement officers interviewed an individual that was present on the day of the overdose. The individual (hereinafter "Individual A") stated that Decedent used Decedent's cell phone to order fifty (50) fentanyl tablets from a source of supply. Individual A admitted to paying \$50.00 via Cash App to cover the shipping of the fentanyl tablets, which were owed to the Decedent from the source of supply. Individual A stated that Individual A and the Decedent had the pills shipped to an apartment in Sault Ste. Marie, Michigan. The apartment was that of a friend and fellow drug user of Individual A and the Decedent. Individual A stated that approximately a day or so prior to the Decedent's death, Individual A and the Decedent retrieved the fifty (50) fentanyl tablets from the apartment mailbox. Individual A stated that the fentanyl tablets were packaged in a vacuum sealed bag, hidden inside a stuffed animal, and then placed in a shipping box. Individual A then explained that an image of the tracking number for the package containing the fentanyl tablets was located on the Decedent's phone.

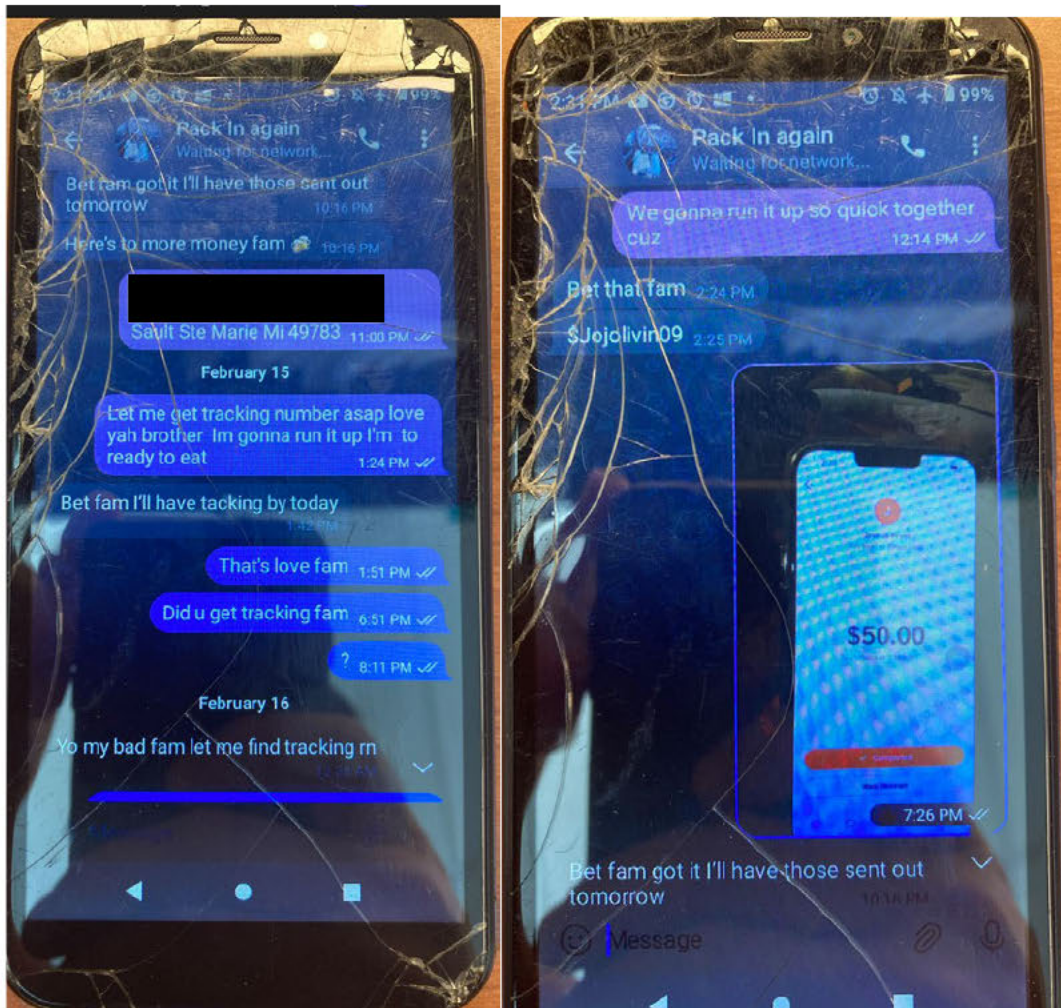
11. A state of Michigan search warrant was subsequently authorized for the Decedent's phone. Investigators conducted a manual search and Cellbrite extraction of the Decedent's phone. Messages were located on the Decedent's Telegram App between the Decedent and the Telegram account "Pack In again." This review

indicated that on or about February 14, 2023, Telegram messages between the Decedent and the Telegram account “Pack In again”, which investigators later learned was used by PACKER,<sup>1</sup> shows the Decedent providing PACKER with the name and address of the apartment to send the M-30 pills to, which corroborated the statements of Individual A. Additionally, PACKER provided the Cash App \$Cashtag of “\$Jojolivin09”. The message also shows the Decedent providing PACKER a screen shot photo of a Cash App payment of \$50.00 to “Joshua PRYOR,” which investigators later learned, as further described below, is an alias for PACKER. PACKER had the \$Cashtag “\$Jojolivin09”. PACKER then responds to the Decedent, “Bet [OK] fam [friend] got it I'll have those [M-30 tablets] sent out tomorrow.”

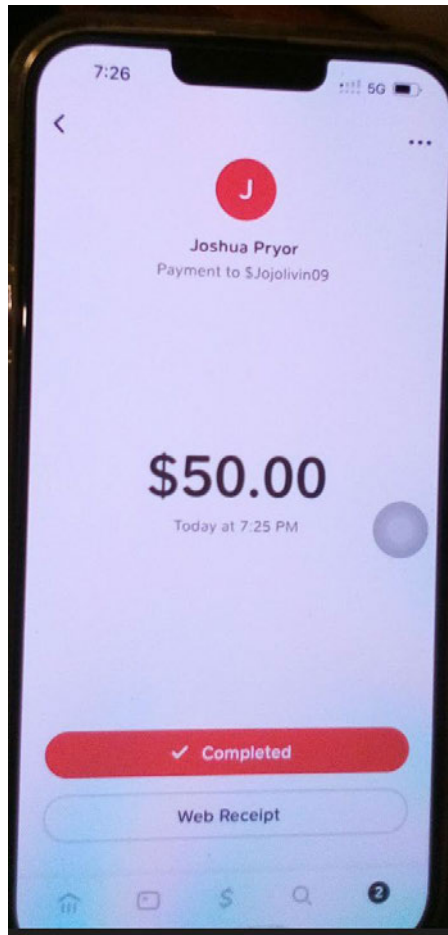
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<sup>1</sup> Details regarding PACKER utilizing the Telegram Account “Pack in again” are described in the ensuing paragraphs of this continuation.





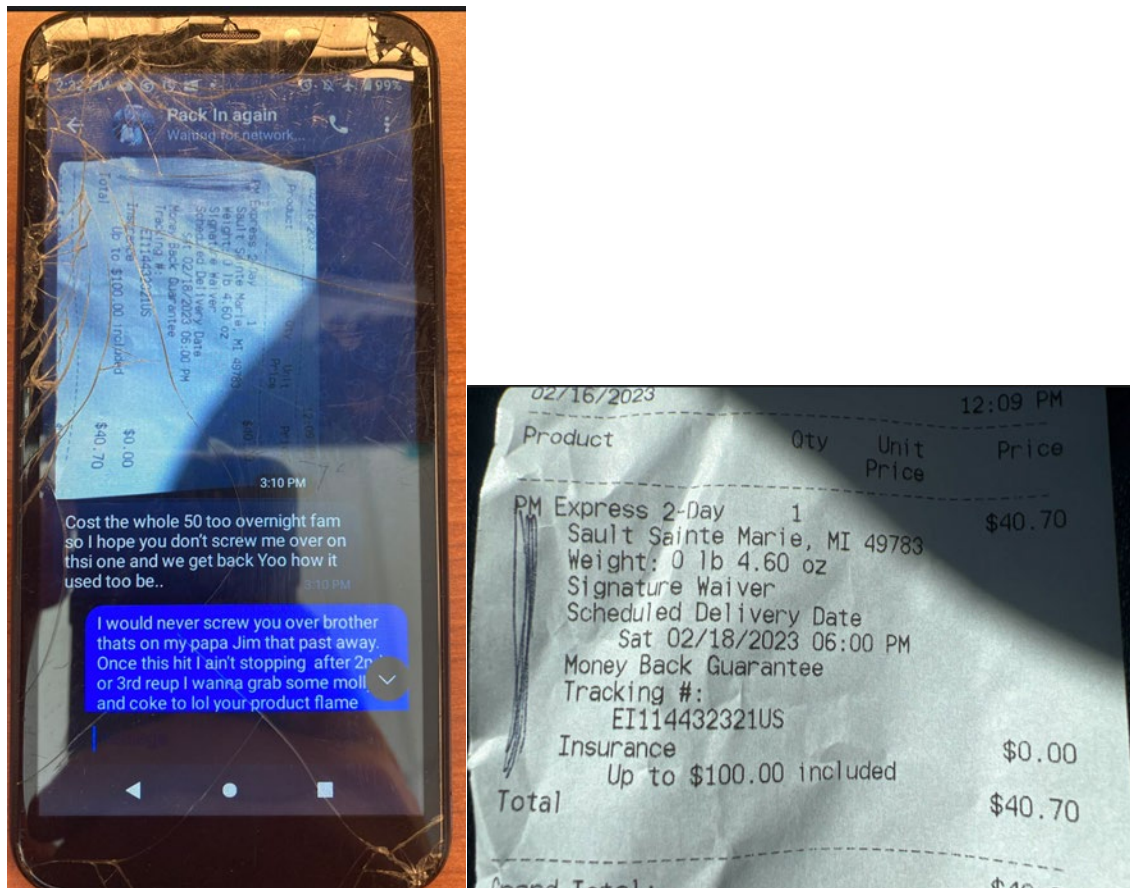




**On February 14, 2023, Telegram messages between the Decedent and PACKER showing PACKER providing the Decedent with a Cash App \$Cashtag of “\$Jojolivin09”. The message also shows the Decedent providing PACKER a screen shot photo of a Cash App payment of \$50.00 to the \$Cashtag “\$Jojolivin09”.**

12. On or about February 16, 2023, a review of the Decedent’s Telegram Account show messages between PACKER, utilizing the Telegram Account “Pack In again,” and the Decedent, in which PACKER sends a photo of a United States Postal Service receipt, which shows a tracking number and scheduled delivery date of the fentanyl tablets. The receipt indicates the package was sent via U.S. Postal Service Priority Mail Express 2-Day shipment, in the amount of \$40.70, with quantity of one (1), and dated February 16, 2023. The receipt also listed the delivery location of Sault

Sainte Marie, MI 49783 with a corresponding scheduled delivery date of Saturday February 18, 2023. Also located on the bottom portion of the receipt was a U.S. Postal Service tracking number of EI114432321US. The U.S. Postal Inspection Service (USPIS) later confirmed this number was a U.S. Postal Service tracking number. USPIS further identified that on February 16, 2023, a male suspect paid cash for the package to be delivered from a U.S. Post Office, located at 2675 N. Decatur Blvd., Las Vegas, Nevada 89108, to the address of the apartment described above.



**Telegram messages between the Decedent and Telegram Account “Pack In again” showing an Express 2-Day tracking receipt which provides a tracking number and scheduled delivery date of the fentanyl pills.**



Screen shot from a video of a male subject, later identified as Kai PACKER, dropping off the package addressed to Sault Ste. Marie, Michigan at the customer counter at the U.S. Post Office on February 16, 2023.

**Investigators Determine that Kai PACKER Uses the Alias “Joshua PRYOR” and Uses CashApp to Receive Narcotics Payments**

13. Also found on the Decedent’s phone was an image of a Cash App web receipt for a Cash App payment of \$50.00 to a Joshua PRYOR with an assigned Cash App, Cashtag of \$Jojolivin09. The above information was corroborated through an undocumented<sup>2</sup> confidential source, who was interviewed by HSI and TRIDENT

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<sup>2</sup> The source is “undocumented” because they were not being paid for their information by law enforcement, wanted to remain anonymous, and did not want to be involved further in the investigation beyond providing this information.

investigators concerning Decedent's overdose death. The source stated that the individual who would send Nolan the blue M-30 fentanyl pills was a 19/20-year-old male named Joshua PRYOR. The source further stated that PRYOR was originally from Oregon, but currently lives in Las Vegas, Nevada. The source explained that to be able to purchase narcotics from PRYOR, potential customers were required to go through a "screening process" through his Snapchat and/or Instagram apps. Once the potential customer passed the "screening process" they would be given access to PRYOR's online store front, via the Telegram app. The online store front listed the type of narcotics available for purchase, the quantity available, and the prices for the specific quantities. The confidential source further stated that during the purchase of the narcotics, a portion of the purchase money is transferred through Cash App and the remainder of the purchase money is sent through the U.S. Postal Service. The source described that the blue M-30 fentanyl pills were always vacuumed sealed and then hidden within books, clothes, stuffed animals, etc. and were always shipped using the U.S. Postal Service. The confidential source also stated that he/she observed Decedent pay \$8,000 for one thousand (1,000) blue M-30 pills believed to contain fentanyl.

14. HSI Sault Ste. Marie later served an administrative subpoena to Cash app (Block Inc.), regarding the subscriber and transaction information for \$Cashtag user: \$JoJolivin09. This \$Cashtag subscriber information was assigned to Joshua PRYOR with a date of birth in 1999.

15. Through further research, it was determined that on May 27, 2022, the

Las Vegas Metropolitan Police Department (LVMPD) encountered Kai Livingston PACKER while PACKER was smoking marijuana in public. At the time of the encounter the LVMPD Officer identified PACKER, via his Oregon driver's license, which had a listed address of 5265 NE 19th Ave, Portland, Oregon, 97211. At the time of this interaction, PACKER consented to a search of his person. The LVMPD Officers subsequently located a Visa debit card embossed with the name of Joshua PRYOR, with a corresponding account number ending in 5236. The LVMPD Officer subsequently seized the Visa debit card and issued PACKER a citation for smoking marijuana in a public place.

16. A review of the Cash App information associated with PRYOR's (PACKER's) \$Cashtag: \$JoJolivin09 revealed that on May 13, 2022 (14 days prior to his encounter with the LVMPD), PACKER aka PRYOR was issued a Cash App debit card with account number [REDACTED] 5236 assigned to it. PRYOR's (aka PACKER) \$Cashtag: \$JoJolivin09 account also shows that an additional Cash App debit card (card number [REDACTED] 0569) was issued to this account on May 29, 2022. This card was used after the LVMPD seized the previous card from PACKER and is still currently in use.

17. Further Cash App transaction details for PRYOR's \$Cashtag: \$JoJolivin09 (aka PACKER) revealed that PACKER's father, Brett Michael PACKER, initiated a currency transaction of \$100.00 with PRYOR's Cash App account, \$Cashtag: \$JoJolivin09 (aka PACKER) on January [REDACTED], 2023, with the corresponding message: "Happy Birthday". This transaction occurred one (1) day



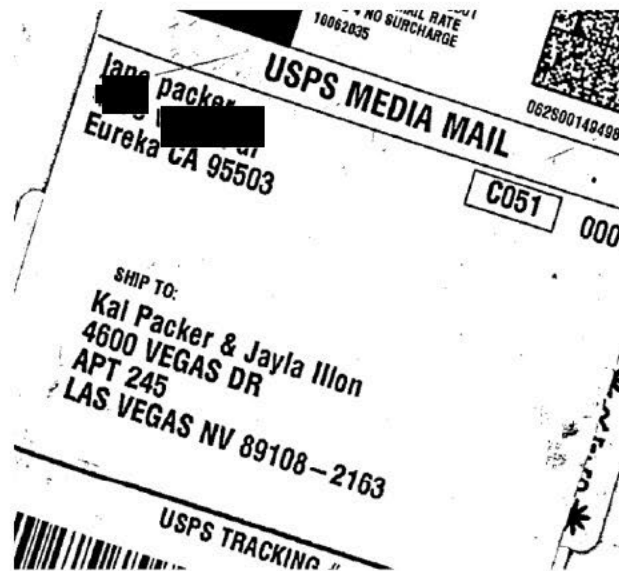
after Kai Livingston PACKER's birthday. The date of birth associated to the \$JoJolivin09 account is listed as 06/█/1999.

**Investigators Determine that Kai PACKER is Associated with 4600 Vegas Dr., Apt. 245, Las Vegas, NV 89108 and that Kai PACKER Also Uses the Alias "Joseph Malik LIVINGSTON"**

18. Cash App records indicate that 4600 Vegas Dr, Apt 245, Las Vegas, NV 89108 address is listed as the assigned address of PRYOR's (PACKER's) Cash App account. This account has a corresponding Cashtag of \$JoJolivin09. Photos of this address, inscribed on U.S. Postal packages, were found during the search of the Decedent's phone. Research of this address revealed that Joseph Malik LIVINGSTON with a corresponding phone number of (929) 286-8940, is a resident and/or associated to this address.

19. Law enforcement database queries of Joseph Malik LIVINGSTON revealed that LIVINGSTON is a fictitious identity. Investigators could not find any other information (government documents, previous addresses, phone numbers, social media, etc.) that would suggest that Joseph Malik LIVINGSTON is an actual person. Also, U.S. Postal provided photo of package that have been delivered to 4600 Vegas Dr, Apt 245, Las Vegas, NV 89108, which showed Kai PACKER's name on the "SHIP TO:" section of the package. The package had a return address of Jane Packer █, █, Eureka, California 95503. Through system queries and the fact that Brett Packer (Kai PACKER's father) is a Facebook friend of Jane Packer, investigators believe that Jane Packer is Kai PACKER's grandmother (i.e., Brett Packer's mother). Further discovery of PACKER's aliases, to include Joseph Malik LIVINGSTON (DOB 01/20/1998), will be documented throughout the remainder of this probable cause

section.



An image provided by USPIS of a package mailed from PACKER's grandmother to PACKER and Sutton (Iilon is Sutton's middle name) at that address.



An image has been found in PACKER's iCloud account [dkmere@icloud.com](mailto:dkmere@icloud.com) of two identical Nevada driver licenses, with PACKER's photo and his previous apartment, but the name on the licenses is Joseph Malik LIVINGSTON and the date of birth is January



████ 1998 (PACKER's DOB is January █████, 2001). This is an example of PACKER possessing identification containing one of his aliases.

20. An HSI administrative subpoena was served to Tracfone for phone number (929) 286-8940. This phone number is associated to Joseph Malik LIVINGSTON (DOB 01/20/1998) and to the address of 4600 Vegas Dr, Apt 245, Las Vegas, NV 89108. The results of the Tracfone subpoena for (929) 286-8940 revealed the "purchase information" corresponding to the purchase of the Tracfone showed a credit card ending in 0973, with a credit card holder of Kai PACKER, and an address of 939 E. Flamingo Road, Las Vegas, NV 89119. The credit card ending in 0973 was also found in the payment source history information provided by Cash app (Block Inc.), regarding PRYOR's (i.e., PACKER's) Cash App account with \$Cashtag: \$JoJolivin09.

21. Payment source history information provided by Cash App (Block Inc.), regarding PRYOR's (PACKER's) Cash App account with \$Cashtag: \$JoJolivin09 was paid by credit card number(s) █████0350, █████9731, and █████0973. All of these cards were issued by Bancorp Bank. An HSI subpoena was subsequently issued to Bancorp Bank requesting account holder information and transaction information from card numbers █████0350, █████9731, and █████0973.

22. Data from Bancorp Bank card number █████0350 and card number █████9731 revealed that the account holders for both accounts are listed as Joseph LIVINGSTON (PACKER). The address listed to card number █████0350 corresponds to: 4600 Vegas Dr. Apt. 245 Las Vegas, NV 89108.

To summarize, PRYOR's (PACKER's) Cash App account of \$Cashtag: \$JoJolivin09 has a credit card issued to Joseph LIVINGSTON (aka PACKER).

23. A review of the Cash App account information received details that the account holder for card number [REDACTED] 0973 was listed as: Kai PACKER, with a corresponding social security number of [REDACTED]. The address listed on this account is: 939 E Flamingo Rd. Apt. 31 Las Vegas, Nevada 89119 with corresponding phone number of (929) 286-8940. This is the same phone number associated with the address 4600 Vegas Dr, Apt 245, Las Vegas, NV 89108.



**An image of a Bancorp Bank Debit card with the name of Kai Packer which was found on PACKER's iCloud account, "dkmere@icloud.com.". This exact same card is found on PACKER's Cash App account with \$Cashtag "\$jojolivin09" to which PACKER uses the alias of Joshua PRYOR.**

24. The PayPal transaction history connected to card number [REDACTED] 0973 issued to PACKER shows multiple transactions between this account and PRYOR's (aka PACKER's) Cash App account with a corresponding

account number of: [REDACTED] 5993.

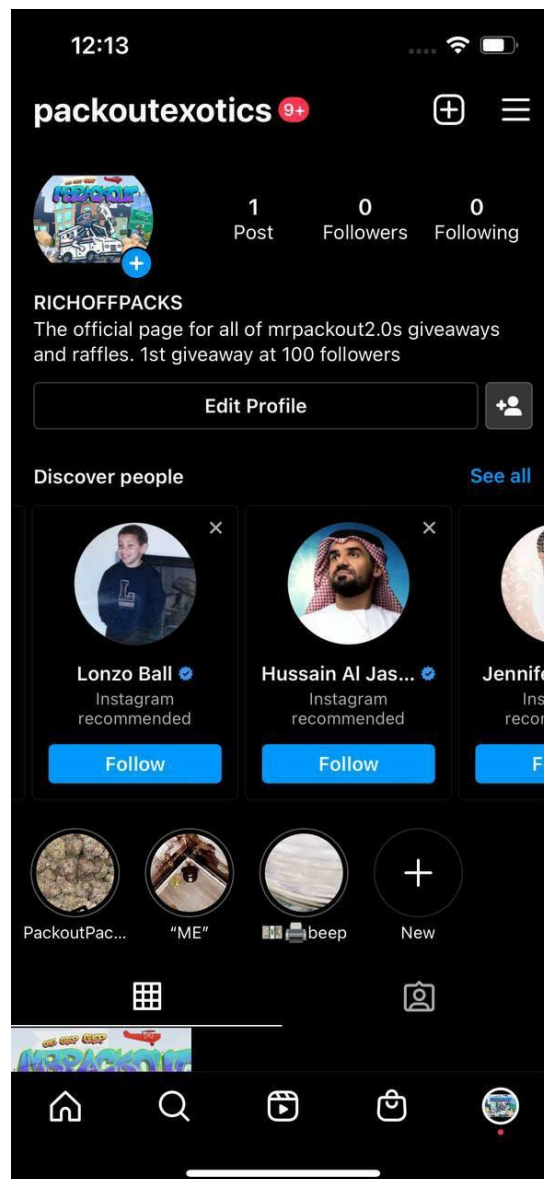


An image was found on PACKER's PACKER's iCloud account, dkmere@icloud.com, of a Navy Federal Credit Union Debit Visa Card with the associated number of [REDACTED] 0776 and name of Baylee Thompson Booth on the card. That same card number was found on the "Payment Source History" section of PACKER's Cash App account with \$Cashtag "\$jojolivin09" to which PACKER uses the alias of Joshua PRYOR. The picture on the iCloud account was from July 15, 2022, and the debit card was added to PACKER's Cash App account July 16, 2022.

### **Investigators Determine PACKER Uses Social Media and Text Messaging Platforms to Traffic Narcotics**

25. A continued search of the Decedent's cell phone revealed that the Decedent communicated with an Instagram user who utilized the Instagram username packoutexotics. Further details located on the Decedent's phone indicated that in order for the Decedent to obtain Telegram (mobile messaging app) access he would have to perform a three (3) step process. "STEP 1: Send a video of you with either packs or Racks via Snapchat. STEP 2: Wait for Telegram Link. Step 3: Let's

build trust. Place an order. We can Start as big or small as needed.” I note that this is consistent with the information provided to law enforcement by the undocumented confidential source. I understand from my training and experience that “packs” are referring to a pound or more of a narcotic and “racks” are referring to a thousand dollars or more, in cash.



A screen shot of packoutexotics Instagram page found on the Decedent’s phone. The Instagram photo shows the name “mrpackout”, with the following message below: “The official page for all of mrpackout2.0s giveaways and raffles. 1<sup>st</sup> giveaway at 100 followers.”

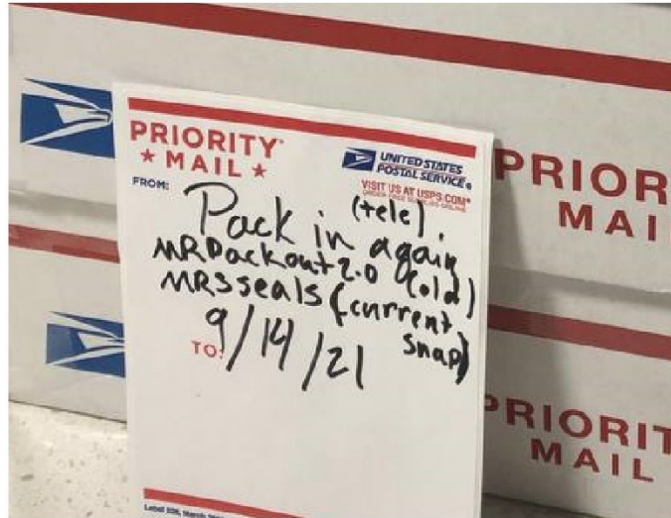




A Photo of packoutexotics Instagram profile picture found online.



A photo found on Decedent's phone with step-by-step instructions on how to get verified utilizing Snapchat and Telegram to reach the store front and purchase narcotics. As seen from the photo, packoutexotics Instagram profile picture is in the background and Snapchat handle Mr. Packout2.0 on the side.



A photo found on Decedent's phone with Kai PACKER's Telegram username "Pack in Again", Snapchat username "mrpackout2.0", and "mr3seals".

26. An HSI administrative subpoena was served to Instagram (Meta Platforms, Inc), regarding the subscriber information, IP Logs, password information, associated accounts, associated financial account information, and current account status for the account assigned to packoutexotics. Below was the information provided from Meta Platforms Inc.:

- a. Name Definition: First Name RICHOFFPACKS
- b. Registered Email: [kaipacker12@gmail.com](mailto:kaipacker12@gmail.com)
- c. Vanity Name: packoutexotics
- d. Registration Date: 03 FEB 2022 23:50:08 UTC
- e. Registration IP: 2600:8801:3528:5900:c450:8de3:86c2:3a89
- f. Phone Number: +1 (503) 602-8295

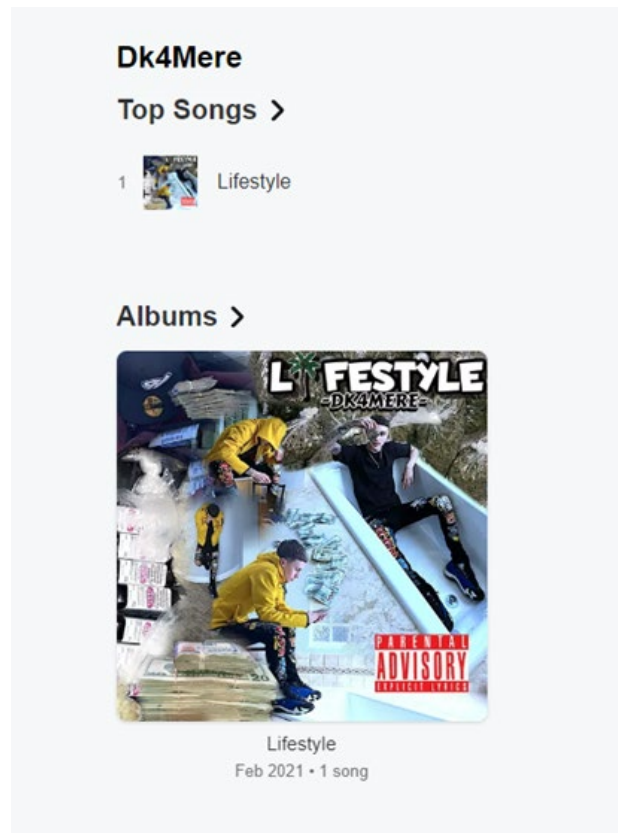
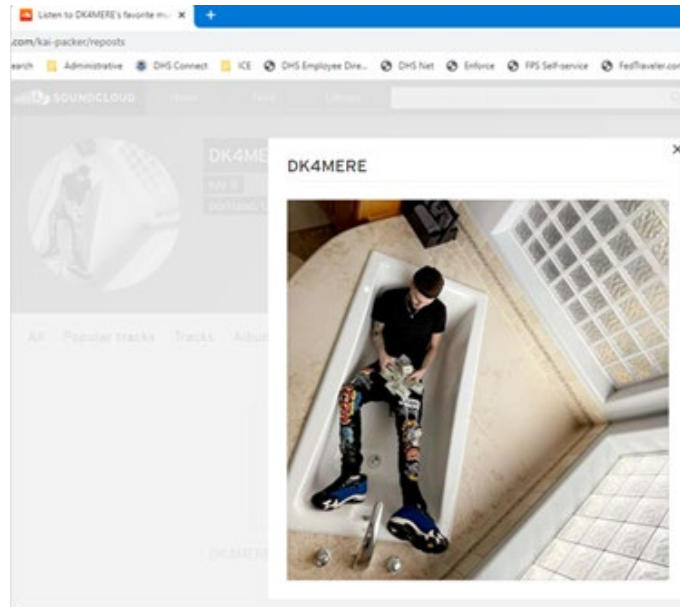
27. Through research and deconfliction conducted by HSI intelligence analysts, phone number (503) 602-8295 assigned to the packoutexotics Instagram

account was found to be associated to a Drug Enforcement Administration (DEA) investigation conducted by DEA, Des Moines, Iowa. The DEA Des Moines investigation identified Kai Livingston PACKER as being associated with the aforementioned phone number. During this investigation, PACKER was identified as residing in Las Vegas, Nevada.

28. The DEA Des Moines investigation uncovered the following information:

- a. On November 18, 2021, DEA agents conducted a post-Miranda Interview of Individual B.
- b. During the post-Miranda interview of Individual B, Individual B provided the DEA Des Moines Resident Office (DMRO) personal information regarding his source of supply (SOS) located in Las Vegas, Nevada. Individual B stated he communicated with his SOS through Telegram. Individual B stated the SOS utilized the Telegram name “Pack in again”. Individual B stated his SOS had ties to the state of Oregon.
- c. Individual B showed investigators the cover image of a music album reported to have been produced by the SOS. The album cover corresponds to a single titled “Lifestyle” by the artist “DK4MERE”. There are a total of four (4) images of the same individual (DK4MERE) on the album cover.





**Images of the DK4MERE music page on the publicly available music website “Soundcloud,” as indicated during the interview with Individual B. The individual in these images is Kai PACKER.**

29. Telegram messages between username “Pack in again” and the

Decedent were found on the Decedent's phone regarding the Cash App transaction and shipment of the blue M-30 fentanyl pills, to include the U.S. Postal Tracking number and the photos of PACKER. Below is TRIDENT's documentation of that conversation via their cell phone search warrant:

February 14, 2023:

- Decedent messages Pack In again "I'll send yo 50for overnight shipping and your finna hook it up and get this out today so we can get back to business. Appreciate you. Whats the snap. We gonna run it up so quick together cuz"
- Pack In again messages Decedent "Bet that fam. \$Jojolivin09"
- Decedent messages Pack In again a picture of a Cashapp payment to "Joshua PRYOR" \$jojolivin09 for \$50.00 on 2-14-23@ 7:26PM.
- Pack In again messages Decedent "Bet fam got it I'll have those sent out tomorrow. Here's to more money fam"
- Decedent messages Pack In again "[REDACTED]  
[REDACTED] Sault Ste Marie Mi 49783"

February 15, 2023:

- Decedent messages Pack In again "Let me get tracking number asap love yah brother im gonna run it up I'm to ready to eat"

- Pack In again messages Decedent “bet fam I'll have tacking by today”
- Decedent messages Pack In again “that's love faro. Did u get tracking fam. ?”

February 16 2023:

- Pack In again messages Decedent “Yo my bad faro let me find tracking rn”
- Decedent messages Pack In again “Yah cuzjust lemmie know I got it going to my girls so I need it ya know. I'm ready to run it up.”
- Decedent messages Pack In again “Fam I hate bugging but did you find that tracking number yet. Or at least know what day its coming.”
- Pack In again messages Decedent a picture of a receipt which has the tracking number (Ell 14432321US) sent out on 2-16-23 @ 12:09PM. It is for express 2 day shipping to Sault Ste. Marie MI 49783 with a package weight of 0 lbs 4.60 oz. The scheduled delivery date is Saturday 2-18-23 @6:00PM for the price of \$40.70.
- Pack In again messages Decedent: “Cost the whole 50 too overnight fam so I hope you don't screw me over on this one and we get back yoo how it used to be.”
- Decedent messages Pack In again “I would never screw you over

brother that's on my papa Jim that past away. Once this hit I ain't stopping after 2nd or 3rd reup I wanna grab some molly and coke to lol your product flame.”

- Pack In again messages Decedent “Bet fam let's get it I'm looking forward too it.”

30. Through the aforementioned DEA interview (paragraph 28) that was conducted by agents from the Des Moines office on November 18, 2021, regarding “Pack in again”, the above Telegram conversation between the Decedent and “Pack in again” on Telegram (i.e., PACKER’s Telegram account), the HSI administrative subpoena to Meta for Instagram user packoutexotics showing an email address of [kaipacker12@gmail.com](mailto:kaipacker12@gmail.com) and phone number 503-602-8295, and through the social media research showing photos of Kai PACKER with the moniker of “DK4MERE”, I believe that Kai Livingston PACKER is Instagram user packoutexotics, the Telegram user of “Pack in again” , and the Instagram user “DK4MERE”.

31. Photos found on the Decedent’s phone depicted a USPS mail truck with “mrpackout 2.0” across the top with suggestions of giveaways and raffles found on “packoutexotics,” as well as ways to get verified through the Snapchat account “mrpackout2.0” and gain access to the Telegram account “Pack In again.” Similar photos were found in iCloud accounts for Packer, including the USPS mail truck with “mrpackout2.0” across the top.

32. An HSI administrative subpoena was served to Snap, Inc (“Snapchat”),

regarding the subscriber information, IP Logs, password information, associated accounts, associated financial account information, and current account status for the account assigned to Snapchat usernames “mrpackout2.0” and “mr3seals”. Below was the information provided from Snap Inc.:

- a. Username: mrpackout2.0
  - i. Phone Number: +1 (971)-393-3125
  - ii. Status: Active
  - iii. Created: December 11, 2020
- b. Username: mr3seals
  - i. Email: [jameremalik12@gmail.com](mailto:jameremalik12@gmail.com)
  - ii. Display names: Thepack Isout, Packout 4.0, Jamere Brown
  - iii. Deactivated: December 7, 2021

33. An HSI administrative subpoena was served to Cash App (Block Inc.), regarding the subscriber and transaction information for the Decedent’s Cashtag “[REDACTED]”. The information received from Cash App (Block Inc.), revealed that the Decedent started paying Kai LIVINGSTON, an alias used on Kai PACKER’s Cash App, Cashtag \$cashkidkail0x (this was verified via a subpoena to Cash App regarding Kai PACKER), on January 20, 2021. Starting on January 20, 2021, through March 17, 2021, the Decedent paid PACKER \$9,505.00 in eleven (11) different Cash App transactions. Then from December 15, 2021, to December 31, 2021, the Decedent paid Sutton’s Cash App \$2,570.00 in four (4) different Cash App transactions.

34. Evidence obtained during the investigation indicates that PACKER

has used the Snapchat account “mrpackout2.0” for illicit purposes since he created it on December 11, 2020. The Decedent was only able to purchase narcotics from PACKER after he was “verified” through Snapchat. A subpoena for Snapchat account “mrpackout2.0” shows that PACKER created the account on December 11, 2020. A subpoena to the Decedent’s Cash App account shows that the Decedent paid PACKER on January 20, 2021. Because the Decedent had to be verified by PACKER on Snapchat prior to the purchase of narcotics, sometime between December 11, 2020, and January 20, 2021, PACKER used his Snapchat account to verify the Decedent, which enabled the Decedent to have access to his storefront on Telegram. Once the Decedent obtained access to the storefront, he had the ability to purchase narcotics from PACKER. Furthermore, Kai PACKER’s Cash App, Cashtag: \$cashkidkai10x received \$79,039.06 in Cash App transactions from forty-seven (47) different Cash app accounts from December 2020 to April 2021, indicating that he was verifying other purchasers of narcotics through “mrpackout 2.0” as early as December 2020.

**A 2021 search warrant in Clackamas County, Oregon ties PACKER to drug distribution**

35. Through HSI intelligence research and multi-agency deconfliction, information was received that on May 27, 2021, the Clackamas County (Oregon) Inter-Agency Task Force (CCITF), with the assistance of multiple other law enforcement agencies, including HSI and the Federal Bureau of Investigation (FBI) Portland Division, executed a state of Oregon search warrant at 5265 NE 19<sup>th</sup> Avenue, Apt. B, Portland, Oregon 97211, which was PACKER’s residence at the time.

I note this is the same address PACKER provided to law enforcement officers in Las Vegas on May 27, 2022. The search warrant was issued in relation to a drug distribution and money laundering investigation. During the search of PACKER's bedroom, investigators discovered sixty (60) round, blue pills with an M-30 stamp, 1.75lbs of White oblong pills that appeared consistent with "Xanax", 78.3 grams of brown rock type substance which field test positive for heroin, and (4) blue pills with a Tesla logo stamp, amongst other items. During the search warrant PACKER was read his Miranda rights by investigators. PACKER then waived his rights and was subsequently interviewed by investigators. During PACKER's interview he admitted to selling the round blue fentanyl tablets embossed with the M-30 stamp. PACKER also stated that he suspected the blue M-30 pills contained fentanyl.



**Image of the driver's license used by PACKER during a search warrant conducted at his residence on May 27, 2021, in Portland, Oregon.**



**Further analysis of Decedent's phone provides corroborating evidence of PACKER's drug trafficking activities**

36. An image of PACKER's Telegram online store front, displayed in the Telegram app, was found on the Decedent's phone. The corresponding images of suspected narcotics listed on the online store match the narcotics that were found in PACKER's bedroom during the service of the search warrant on May 27, 2021. These images also include the round blue fentanyl tablets embossed with the M-30 stamp. The photo contained the following information:

a. **Boats of Bars** (Suspected as Xanax)

- i. Boat 2k
- ii. Half boat 1000
- iii. Roll 550

b. **Boats of addy** (Suspected as Adderall)

- i. Boat 3000
- ii. Half Boat 2000
- iii. Roll 1200

c. **Boats of m30s** (Suspected as the round blue fentanyl tablets with M- 30 stamped on them)

- i. Boat 7600
- ii. Half Boat 4500
- iii. Roll 1200

d. **Molly** (Suspected as MDMA)

- i. Oz 1800
- ii. Half oz 1050

iii. Ball 300

e. **White** (Suspected as cocaine and/or heroin)

i. Oz 1600

ii. Half oz 1000

iii. Ball 280

37. Through my training and experience, I have learned the terms of quantities are as seen below:

a. A “Boat” refers to a quantity of 1000 tablets.

b. A “Half Boat” refers to a quantity of 500 tablets.

c. A “Roll” refers to an unconfirmed quantity of tablets.

38. Multiple pictures of bulk cash, various narcotics, drug paraphernalia, a money counting machine, and a printer/scanner machine were also found on the Decedent’s phone. Images of U.S. Postal Service packages containing partial names and addresses affixed to the shipper and recipient areas of the packages were also found on the Decedent’s phone. Investigators reviewed these partial names and addresses and determined that the images contained the name of Joseph LIVINGSTON (PACKER), and the address 4600 Vegas Dr, Apt 245, Las Vegas, NV 89108. HSI Intelligence also reviewed open-source photos obtained from the 4600 Vegas Drive apartment complex website and the 939 E. Flamingo Road, Las Vegas, NV 89119 complex website. These photos match the backdrop (back splash, carpet, countertop, closet, shelving system, etc.) of photos found in the Decedent’s cellular phone. In one of the aforementioned photos, it is believed PACKER’s hands are

depicted partially covering the name and address on a U.S. Postal Service package. This image is thought to be PACKER because of PACKER's known tattoos on his right wrist and forearm, which can be compared to photos of PACKER taken from his various social media accounts.

**Investigators complete undercover purchases of fentanyl pills through Kai PACKER, which are shipped to the Western District of Michigan**

39. The following sections detail a series of undercover purchases that a Special Agent in the DEA's Grand Rapids District Office made from Kai PACKER, in which fentanyl or methamphetamine was delivered to the UC in Ottawa County, Michigan. These UC purchases form the basis of the requested charges in this criminal complaint.

**Undercover Purchase #1 – fentanyl pills delivered on February 13, 2024**

40. Over November 13 and 14, 2023, a Special Agent with the Drug Enforcement Administration (DEA) Grand Rapids District Office (GRDO), hereafter referred to as DEA UC, had an undercover conversation with Kai PACKER as part of HSI and DEA's ongoing investigation and its efforts to complete an undercover purchase of narcotics from PACKER and/or his source of supply.

41. The DEA UC contacted PACKER on Instagram via his Instagram account "packoutexotics." The DEA UC asked PACKER if he had a Telegram or signal account. PACKER responded with username "Packout40." The DEA UC then queried the username in Telegram and found the user "packout40." The DEA UC observed that the Telegram account had the same photo that was related to PACKER's Instagram account, which was a cartoon illustration of a United States Postal Service

(USPS) truck with the name “MRPACKOUT” above it.

42. The DEA UC observed other photos associated with the Telegram account “packout40” including bulk amounts of U.S. currency.

43. PACKER sent the DEA UC a Telegram link to a private Telegram group. PACKER told the DEA UC that verification would be needed before ordering from the Telegram group. The verification that PACKER needed was for the DEA UC to video record himself smoking a substance and then send him (PACKER) the video recording while saying the words “what's up packout” in the video. The DEA UC understood that he was to video himself smoking a substance to show PACKER that he was not law enforcement and could be trusted to purchase controlled substances. The DEA UC joined the private Telegram group, which is named “Packout.” PACKER also told the DEA UC that he takes Bitcoin (BTC) as payment.

44. The DEA UC observed in the information section of the private Telegram group “Packout,” that “packout40” was the owner of the group. The DEA UC observed the link for the private Telegram group as “https://t.me/+nWT\_C0xuR1tjOWMx.” The DEA UC also observed the group had 295 members. The DEA UC observed the oldest activity of the group was July 31, 2021, when a deleted account joined the group via an invite link. On November 14, 2023, the DEA UC observed that the private Telegram group remained active because the username “Pack In again” with the title of “admin”, posted a message.

45. The DEA UC observed the photos that had been posted in the private Telegram group, which included pictures of LSD tabs, MDMA Crystals, Cocaine,

Adderall, Xanax, Marijuana, Psilocibin, Ecstasy, and Ketamine. the DEA UC also observed several photos in the private Telegram for PACKER that had a black background with white or silver writing, which consisted of specific dates and the words “MR.PACKOUT” on the black background and an unknown quantity of a suspected controlled substance. These photos indicated to the DEA UC that the seller of the controlled substances was PACKER. The DEA UC also observed that PACKER had a “2022 best cash in mail methods (CIM),” where PACKER explains how to mail money to him for payment.

46. On November 17, 2023, the DEA UC continued the undercover conversation with PACKER via Telegram. On November 17, 2023, the DEA UC, sent a verification video of the DEA UC smoking a cigar that was intended to look like a marijuana blunt while saying “what's up packout” in the video. PACKER then responded to the DEA UC that the verification video was acceptable.

47. PACKER asked the DEA UC what he was looking to buy. The DEA UC responded he wanted Oxycodone pills also known as “blues” or “M30's”. Based on the results of the investigation and my training and experience, investigators know that M30s are usually counterfeit Oxycodone pills that contain fentanyl. The DEA UC also mentioned that the Adderall pills looked good. Based on my training and experience, Adderall pills sold online are typically counterfeit and contain methamphetamine. PACKER told the DEA UC, that he does not really mess around with pills anymore but told the DEA UC that he could get boats (a boat is a coded drug term referred to 1,000 pills of a controlled substance). PACKER told the DEA UC he could get

Oxycodone pills from his source of supply (SOS), and that 1,000 of those pills would cost \$2,500.00. PACKER also told the DEA UC that 1,000 Adderall pills would cost \$3,000.00. PACKER explained to the DEA UC that an order of Oxycodone pills has to be to a minimum of 500 pills per order. I note that Oxycodone is the active ingredient in the specific name brand of OxyContin. Oxycodone and OxyContin are commonly referred as the same thing.

48. On November 21, 2023, the DEA UC told PACKER he would purchase the 500 Oxycodone pills. The DEA UC contacted PACKER again on November 27, 2023, by messaging his Instagram account “packoutexotics” because he had not yet heard from PACKER confirming the deal. Shortly after reaching out, PACKER messaged the DEA UC on Telegram saying, “Yoo my bad fam got a little busy”. The DEA UC asked PACKER for a bitcoin (BTC) address to send bitcoin to in order to pay for the M30 pills. A bitcoin address contains an individual’s personal cryptocurrency wallet, which allows the individual to receive cryptocurrency. On November 29, 2023, PACKER sent the DEA UC a BTC address of “qpfjgwzzcvustdvl8tt4l643aqj4tylpwc5zsmqke9” that investigators were able to attribute to be a BTC Cash Wallet.

49. On November 30, 2023, the DEA UC asked PACKER to verify the M30 pills he was ordering by sending him a photo. PACKER would not send a photo, so the DEA UC did not send the cryptocurrency.

50. On December 14, 2023, Kai PACKER messaged the DEA UC on Telegram stating that PACKER would give the DEA UC his source of supply (SOS)

contact information. The DEA UC asked PACKER if PACKER's SOS was on Telegram. PACKER responded with a Telegram username of "PNWpriority".

51. The DEA UC located the username of "PNWpriority". The DEA UC observed the username was "PNWpriority" and the name for the account was "PNWpriority". The DEA UC observed the account was a United States Postal Service emblem along with the phrase "PRIORITY PACKS" next to it.

52. On January 2, 2024, the DEA UC reached out to PACKER's alleged source of supply, "PNWpriority" via Telegram for counterfeit Oxycodone Pills. On January 4, 2024, the DEA UC checked the chat conversation. The DEA UC found PNWpriority responded to the DEA UC's initial message with "Yo fam." The DEA UC noted that PACKER used the terminology "fam" as well in previous UC conversations. PNWpriority was aware that the DEA UC was looking for pills to buy.

53. On January 5, 2024, the DEA UC observed that PNWpriority did not have a menu (a menu is a listing of what drugs are available and at what prices per quantity). PNWpriority told the DEA UC that PNWpriority can send pictures or videos of the product for a quality check. PNWpriority also asked the DEA UC to verify he was a legitimate customer by sending a video of the DEA UC smoking or counting money saying "PNWpriority". I note that this is the same mode of operation that PACKER was using under the alias "Packout". The DEA UC sent a verification video of counterfeit Adderall pills to PNWpriority with music playing in the background.

54. On January 7, 2024, the DEA UC saw a message from PNWpriority that PNWpriority did not accept the verification video and requested the DEA UC to take



a video of himself saying “what's up north west.” The DEA UC noted that PACKER previously had a similar verification process wanting a video of the DEA UC saying “what's up packout”. The DEA UC also observed that PNWpriority said that he currently had a boat (a boat is drug trafficking terminology for 1,000 pills). The DEA UC responded to PNWpriority asking what kind of a boat PNWpriority had and how much the boat would cost.

55. On January 8, 2024, the DEA UC looked back at the UC Telegram conversation and observed PNWpriority had sent a picture of blue circular pills with a “M” stamp and a “30” stamp, consistent with what an Oxycodone pill looks like. The DEA UC then sent another verification video himself smoking a cigar that looked like a marijuana “blunt”, however, the video was filmed with sparse lighting and PNWpriority responded that the video verification was not satisfactory and stated that “this shit is not kids candy I'm not gonna do business until I get a legit verification video”. The DEA UC then sent a new one of the DEA UC smoking a cigar that was intended to look like a marijuana “blunt,” in which PNWpriority said, “works for me.” PNWpriority then asked the DEA UC what he was looking for.

56. On January 9, 2024, the DEA UC told PNWpriority that he was looking for “blues” (blues are a term drug dealers use when referring to counterfeit Oxycodone pills containing fentanyl), and Adderall pills. On January 12, 2024, the DEA UC noticed he had a message from PNWpriority from January 11, 2024. The DEA UC responded and he and PNWpriority discussed the minimum amount of pills that needed to be purchased. PNWpriority told the DEA UC a minimum of 500 pills per

order. On January 14, 2024, the DEA UC asked PNWpriority how much 500 pills would cost. On January 14, 2024, PNWpriority responded saying that it would cost \$1250.00 for a “half boat” (a boat is 1,000 pills, and a half boat is 500 pills).

57. On January 16, 2024, the DEA UC responded to PNWpriority asking for a Bitcoin (BTC) address, and told PNWpriority, he was satisfied with the verification of the Oxycodone pills from PNWpriority. The DEA UC also asked PNWpriority how much shipping would cost. PNWpriority responded to the DEA UC stating that PNWpriority's BTC address changes every 15 minutes, and that there is a 10% fee to be added to the drug transaction due to “taxes and withdraw fees”.

58. On January 18, 2024, the DEA UC and PNWpriority set up a payment for the Oxycodone pills. PNWpriority sent the DEA UC a BTC address of “[REDACTED]XEDb”. On the same day, the DEA UC notified Homeland Security Investigations (HSI) of the BTC address provided. HSI then conducted a transaction for 0.03357343 BTC which equaled \$1,375.00 at the time of transfer. This transaction had the transaction hash “2acc4082f55853847498a9e354a8341c90314c1df22a8c5622f07d503a48a04f”. On the same day, HSI notified the DEA UC that the funds were transferred to the BTC address provided by PNWpriority. HSI investigators notified the DEA UC that the BTC address provided by PNWpriority was affiliated to a Coinbase account.

59. The DEA UC told PNWpriority that the BTC should be in PNWpriority's account. PNWpriority confirmed the BTC was there. The DEA UC provided a UC mailing address to PNWpriority in Jenison, Michigan in Ottawa County. PNWpriority

liked the address message and provided a tracking number for the package.

60. On or about January 19, 2024, the DEA UC served a subpoena to Coinbase for the information associated with the bitcoin wallet address used in the purchase of M30 pills from PNWpriority. The information returned revealed that the Coinbase account associated with the BTC wallet address comes back to Jayla Sutton, DOB: [REDACTED]. This is significant because Sutton and PACKER have been seen together during surveillance operations and, as further described in this affidavit, have been associated living together at common addresses. Addresses on the account include: 7340 W Russell Road, Apt # 2081, Las Vegas, NV 89113, 3149 East Desert Inn Road, Apt # 32, Las Vegas, NV 89121 (a previous address of Sutton's), 4600 Vegas Drive, Apt # 245, Las Vegas, NV 89108 (Sutton's Nevada plated Mercedes Benz and driver's license are registered to this address), and 939 E Flamingo Rd, Las Vegas, NV 89119 (PACKER had a credit card # [REDACTED] 0973 that is associated to his Cash app with \$Cashtag: \$JoJolivin09, that used this address). Further, Sutton's phone number was listed as 626-715-4402, which investigators have verified as Sutton's phone through system queries and a subpoena to the cell provider. Sutton's emails on the accounts are listed as: [jaylaiilon@yahoo.com](mailto:jaylaiilon@yahoo.com), [jaylaiilon@icloud.com](mailto:jaylaiilon@icloud.com), which investigators have verified as Sutton's iCloud account and Yahoo account through subpoenas and warrants to iCloud and Yahoo. The Coinbase account was linked to a JP Morgan Chase Checking Account # [REDACTED] 2770. Sutton is listed as the account holder for the Chase bank account and listed the address of 4600 Vegas Drive, Apt # 245, Las Vegas, NV 89108. Sutton's BTC Wallet with Coinbase,

“[REDACTED]XEDb” was created on 11/30/23 @ 12:59 UTC. Finally, the one debit card tied to the Coinbase account with the number [REDACTED]0973” has Kai PACKER listed on the account, with an expiration date of June 2025.



**Image of Sutton’s Nevada Driver’s License, showing the 4600 Vegas Dr. #245, Las Vegas, Nevada address**

61. The DEA UC noticed similarities in the language used between PACKER and the DEA UC, and PACKER’s alleged source of supply (SOS), PNWpriority. Also, the results of the Coinbase subpoena showed the payment for the 500 counterfeit Oxycodone went to Jayla Sutton and Kai PACKER, given that

Sutton's JP Morgan Chase Checking account is tied to the Coinbase account and PACKER's debit card is tied to the account. Through my training and experience I know that narcotics dealers will attempt to conceal their identity by using multiple aliases in social chat platforms. I have also learned in my years of experience that a narcotics dealer's "source of supply" are the individuals that get paid. In other words, dealers do not accept risk and then typically allow a dealer not involved in the transaction to accept payment on their behalf. Consequently, I believe PNWpriority is PACKER.

62. On February 12, 2024, a package of approximately 500 counterfeit oxycodone pills (processed as DEA Exhibit 1 under the DEA case number assigned to this case), suspected to contain fentanyl, were delivered to the UC address in Jenison, Michigan. On February 13, 2024, a U.S. Postal Inspection Service Inspector retrieved the package and turned it over to DEA Special Agents for transport to the DEA Grand Rapids District Office (GRDO). The box was labeled United States Postal Service Priority Mail and had a sender address of "Mike Reynolds 1737 NW 26<sup>th</sup> Ave, Portland OR 97210." This address is associated with a non-profit community center and social service agency but it does not appear a "Mike Reynolds" is associated with this address. Inside the box was a USPS envelope that contained an Old Spice deodorant stick with tape on it. Investigators then removed the deodorant cap and the protective plastic cover, which revealed that the deodorant had been removed and a heat-sealed bag was stuffed inside. The bag contained a clear zip lock bag containing light blue circular-colored pills with the stamp's "M" and "30".

63. On March 20, 2024, the DEA North Central Laboratory provided a chemical analysis report for Exhibit 1, which indicated the net weight of Exhibit 1 is approximately 53.4 grams and the substance was determined to be N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl) (calc. as Hydrochloride).



A photo of the counterfeit oxycodone pills that contained fentanyl (DEA Exhibit 1).

**Undercover purchase #2 – methamphetamine pills delivered on March 13, 2024**

64. On February 22, 2024, approximately 10 days following the delivery of the fentanyl pills (DEA Exhibit 1), the DEA UC messaged PNWpriority saying that the fentanyl pills were good, and that the DEA UC wanted to sample Adderall pills. PNWpriority responded saying that the DEA UC could try 500 pills, but 1,000 pills would get the DEA UC a better price.

65. On February 23, 2024, the DEA UC asked PNWpriority how much a half boat and a full boat would cost. As previously noted, a “half boat” is 500 pills, and a “full boat” is 1,000 pills. PNWpriority confirmed that the DEA UC was shopping for Adderall.



66. On February 24, 2024, PNWpriority messaged the DEA UC that a half boat of Adderall would cost \$3,000.00, and a full boat would cost \$4,400.00. PNWpriority told the DEA UC that the Adderall is 30mg, and that the DEA UC could make a \$26,600.00 profit if the pills were sold \$1 a mg.

67. On February 26, 2024, the DEA UC responded to PNWpriority that those prices were expensive. PNWpriority told the DEA UC that there was a price drop and that PNWpriority had possession of 15 boats worth of Adderall. PNWpriority said the new prices for a half boat of Adderall would be \$1,700.00 and for a full boat would cost \$3,200.00. The DEA UC told PNWpriority that the DEA UC could buy a half boat of Adderalls for \$1,600.00, and that the DEA UC would conduct a deal with PNWpriority in the next day or two. PNWpriority confirmed his intention to enter into the deal by responding “Bet that fam.”

68. On February 28, 2024, the DEA UC messaged PNWpriority to conduct another drug deal. PNWpriority asked if the DEA UC wanted to pay in Bitcoin (BTC), in which the DEA UC responded that BTC works best. PNWpriority sent the BTC deposit address “3ExFUNkUTvbdiDtiS8SoZqNJpTfBk7f5dV”. The DEA UC and PNWpriority agreed that the DEA UC would pay \$1,600,00 worth of BTC for 500 Adderall pills. PNWpriority then asked if the same mailing information used last time would still be used for the drug transaction. The DEA UC confirmed the same mailing address would be used. The DEA UC asked PNWpriority for a new BTC deposit address. PNWpriority sent the deposit address “3ExFUNkUTvbdiDtiS8SoZqNJpTfBk7f5dV” again. The DEA UC told PNWpriority

that the DEA UC was having issues with Coinbase and could not send the BTC to PNWpriority. PNWpriority told the DEA UC that PNWpriority uses Coinbase too, but to switch to Crypto.com app. The DEA UC asked PNWpriority if that is what PNWpriority uses, in which PNWpriority said that PNWpriority just recently switched to it, but still uses Coinbase.

69. On February 29, 2024, PNWpriority messaged the DEA UC saying it appeared Coinbase was operational again.

70. On March 1, 2024, PNWpriority messaged the DEA UC again telling the DEA UC to let PNWpriority know when the DEA UC would be ready to make a deal. On the same day the DEA UC responded asking if the DEA UC should use the same BTC deposit address PNWpriority previously sent. PNWpriority responded stating that PNWpriority was going to send a new deposit address and sent the BTC deposit address “[REDACTED]XEDb” I note this is the same deposit address PNWpriority previously sent. PNWpriority then resent another deposit address to the DEA UC which was “3ExFUNkUTvbdiDtIS8SoZqNJpTfBk7f5dV”. The DEA UC responded to PNWpriority that he would let PNWpriority know when the BTC was sent. PNWpriority then responded if the mailing address and name previously given would be used again, in which the DEA UC confirmed it would. An HSI investigator conducted a BTC transaction to the given BTC deposit address provided by PNWpriority. Following this transaction, PNWpriority confirmed the payment was received and messaged the DEA UC.

71. Based on this information, on March 5, 2024, the DEA UC conducted a public blockchain analysis for the Bitcoin (BTC) deposit address that PNWpriority provided to him. The DEA UC found the UC transaction went to a Crypto.com account. On March 6, 2024, the DEA UC sent a subpoena to Foris Dax Inc, the parent company of Crypto.com, requesting information to the account holder that was in possession of the BTC deposit address “3ExFUNkUTvbdiDtIS8SoZqNJpTfBk7f5dV” that was given by PNWpriority to the DEA UC along with the transaction hash “07a191de999b8d8ffae3a44e639e632105240659b1e60da11ec92a91859f3797”. This transaction hash is unique to the UC purchase of the suspected Adderall (methamphetamine pills) (DEA Exhibit 2) that follows. The DEA UC reviewed the subpoena return, which indicated the account has two unique user IDs # 641479b2-abd4-5a15-93e5-a9a0780081bd, and user ID #49169471. The legal name on the account is Kai Livingston PACKER as well as a screen name of Kai Livingston PACKER. The date of birth (DOB) on the account was the same as PACKER’s – January [REDACTED] 2001. The email associated with the account is kaipacker2001@gmail.com along with a phone number of +1 (702) 268-0202. HSI Investigators issued an administrative subpoena for this telephone number, which returned to Joshua PRYOR, 4600 Vegas Drive, #24<sup>3</sup> Las Vegas, Nevada. The account is paid with a credit card ending in 0569, which is associated with the Cashapp debit card previously noted in paragraph 16. The Crypto.com account was created on

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<sup>3</sup> I believe this is an error and should be #245 because the investigation has not found PACKER to be associated with Apt. #24 in the complex at 4600 Vegas Drive.

February 11, 2024. The ID provided for the account was an Oregon driver's license. The name on the driver's license was Kai Livingston PACKER with a date of birth of January [REDACTED], 2001. The address on the driver's license was 5265 NE 19th Ave, Apt B, Portland, OR 97211. A current photo and video of Kai Livingston PACKER was uploaded to the account as well. The account had a BTC deposit address of “3ExFUNkUTvbdiDtIS8SoZqNJpTfBk7f5dV” and an Ethereum (ETH) deposit address of “0xdfb15E7163005C46fba771aF4FDe9BC9BE9203FE”.

72. On March 4, 2024, the DEA UC messaged PNWpriority to ask if PNWpriority ever obtained a tracking number for the UC purchase that the DEA UC set up the purchase from PNWpriority. PNWpriority responded, saying that Reddit.com was showing the United States Postal Service (USPS) was having missing mail, so PNWpriority did not mail out the UC purchase. PNWpriority told the DEA UC that PNWpriority would mail it out that day (March 4, 2024), via United Parcel Service (UPS).

73. On March 5, 2024, the DEA UC responded to PNWpriority saying that the DEA UC did not hear any of the USPS news and asked what was going on with USPS. The DEA UC told PNWpriority that he wanted to continue using USPS. NW Priority told the DEA UC the Reddit forum was called “r/uspscomplaints”, and that if the DEA UC wanted to try his luck, PNWpriority would ship it via USPS. On the same day, PNWpriority sent a verification photo of the orange oval shaped Adderall pills in a heat-sealed bag on top of a USPS Priority Mail packaging material.

74. On March 6, 2024, PNWpriority messaged the DEA UC again, and told

the DEA UC that PNWpriority would front an extra 500 Adderall pills. I note from my training and experience that “fronting” means that someone is given drugs up front without receiving anything in return at the time of the transaction with the expectation that the source will be paid back out of the sales of the fronted drugs. PNWpriority stated that he was willing to front the 500 Adderall pills to see if the DEA UC is ready to do larger business. PNWpriority stated, “I hope this works out good and we can keep doubling up fam”.

75. On the same day, the DEA UC responded that he would appreciate the front of Adderall pills. PNWpriority stated that PNWpriority would take the risk and front the DEA UC the extra Adderall pills. the DEA UC responded to PNWpriority stating that the DEA UC is ready to continue business and asked for a tracking number for the UC purchase. On the same day, PNWpriority sent a photo of a UPS receipt with the tracking number #1Z0Y24100335467014 circled, as well as a circled item description. The item description on the UPS receipt was "HOODIE". PNWpriority messaged the DEA UC saying that the expected delivery date for the UC purchase was Monday, March 11, 2024. The DEA UC observed the receipt had a shipment identification code “MMVPSexB4SNES”, as well as the receipt total being \$17.84.

76. On March 7, 2024, the DEA UC responded to PNWpriority saying thank you and confirmed that the UC purchase was coming via UPS. After this response the DEA UC logged off Telegram.

77. On March 13, 2024, the DEA UC saw PNWpriority had messaged the

DEA UC on March 9, 2024, and March 12, 2024. On March 9, 2024, PNWpriority stated that the package was being sent United Parcel Service (UPS). On March 12, 2024, PNWpriority messaged the DEA UC again stating that the package should have been delivered. PNWpriority also stated that since the first payment for Adderall was \$1,600.00 worth of Bitcoin (BTC) that the other half would cost \$1,400.00 worth of BTC since PNWpriority fronted 500 suspected Adderall pills to the DEA UC expecting payment for the front on the next buy.

78. On March 13, 2024, DEA investigators received the undercover (UC) purchase of suspected Adderall pills from PNWpriority. On the same day the package was retrieved, investigators found a United States Postal Service (USPS) priority box that was addressed to the UC address and name with a United Parcel Service label. Investigators observed the tracking number on the UPS label was "1Z0Y24100335467014". This package was shipped from a Portland UPS Store. Investigators observed the sending information on the package was handwritten, and came from Cameron EDWARDS from 1737 NW 26th Ave, Portland, OR 97210. This is the same address, with a different name associated to it, as the sending address described above for UC purchase #1. Your affiant believes that it is common for drug traffickers to use fictitious sending addresses to conceal their identity from law enforcement.

79. Investigators opened the parcel and found a yellow Hallmark bag inside. Upon opening the yellow Hallmark bag, investigators discovered USPS priority mail packaging material, balloon packages, a glow bounce ball, and a pink package wrapped



in bubble wrap. Upon opening the bubble wrap, investigators found a one-sided pink Ziplock bag. On the other side were cartoon characters on a clear background. Investigators searched the Ziplock bag and discovered a “FoodSaver” brand heat-sealed bag which contained a Ziplock bag with suspected Adderall pills inside (subsequently processed as DEA Exhibit 2 under the case number assigned to this investigation).



**A photo of the methamphetamine pills (counterfeit Adderall) obtained during UC Purchase #2 (DEA Exhibit 2)**

80. On March 13, 2024, PNWpriority messaged the DEA UC again saying “Yerrr”. The DEA UC responded saying that the DEA UC received the package of suspected Adderall. The DEA UC also told PNWpriority that the color of them did not look right, and that there were multiple pills crushed up. PNWpriority responded saying that is not how PNWpriority does business, and if there are any complaints on

it that PNWpriority and the DEA UC can do a switch. The DEA UC responded by saying that the DEA UC will let PNWpriority know in a few days about the suspected Adderall pills. PNWpriority responded to the DEA UC saying his packager sent the DEA UC the same pills that PNWpriority currently has, so the quality should still be good. PNWpriority also said instead of paying \$1,400.00 of BTC for the second half of the suspected Adderall, that the DEA UC would only have to pay \$1,100.00 worth of BTC.

81. On March 13, 2024, the DEA UC conversed via Telegram with Kai PACKER's username "packout." On this date, PACKER messaged the DEA UC stating "Yoo my boy said give you a text all good?". The DEA UC responded on the same day saying that everything was good and asked how PACKER was. PACKER then responded stating "All good fam how bout you ? How's it going with my buddy [PNWpriority] all good?" On March 14, 2024, the DEA UC responded to PACKER stating that everything was good.

82. On April 16, 2024, the DEA North Central Laboratory provided a chemical analysis report for DEA Exhibit 2, which indicated the net weight of Exhibit 2 is approximately 359.2 grams and the substance identified was determined to be Methamphetamine (calc. as Hydrochloride) and Caffeine.

83. On March 20, 2024, the DEA UC saw PNWpriority had messaged the DEA UC on March 19, 2024. On March 19, 2024, PNWpriority had stated "How those movin fam ?".

84. On March 20, 2024, the DEA UC responded to PNWpriority stating that

the DEA UC was able to move some, but not all of the product. PNWpriority then responded stating that it was all good.

85. On March 24, 2024, PNWpriority messaged the DEA UC saying that PNWpriority would drop the price of the front of money to \$900.00. PNWpriority said the price drop would be from \$1,400.00 to \$900.00 since the Adderall pills PNWpriority sent the DEA UC were of bad quality.

86. On March 25, 2024, PNWpriority messaged the DEA UC again saying that the DEA UC had not been active in over a week and was seeing if the DEA UC was okay. PNWpriority then said PNWpriority took a risk fronting the pills [DEA Exhibit 2] to the DEA UC and was worried PNWpriority did not hear from the DEA UC in 11 days.

87. On March 26, 2024, PNWpriority messaged the DEA UC again saying “yo”.

88. On March 28, 2024, PNWpriority stated “Bro” and “Dont want to take it to the next step to re cooperate last funds but if I dont get an update bro I'll have no choice”.

**Undercover Purchase #3 – fentanyl delivered on April 29, 2024**

89. On April 11, 2024, the DEA UC responded to PNWpriority that the DEA UC was back. On the same day the DEA UC and PNWpriority talked about an additional purchase of more counterfeit Oxycodone, also known as “M30s”

90. The DEA UC and PNWpriority agreed on the price for the M30s to cost \$1,250.00 worth of Bitcoin (BTC) and then an extra \$900 worth of BTC for the extra

counterfeit Adderall pills (DEA Exhibit 2) that DEA received on March 13, 2024. PNWpriority told the DEA UC that PNWpriority would cover the cost of shipping and packaging. The DEA UC then asked if PNWpriority wanted the BTC sent to the same BTC deposit address PNWpriority previously sent the DEA UC for the second UC purchase of counterfeit Adderall pills. PNWpriority stated “Yessir”. PNWpriority then sent the DEA UC the BTC deposit address "3ExFUNkUTvbdiDtIS8SoZqNJpTfBk7f5dV".

91. An HSI investigator then sent the funds the BTC deposit address provided by PNWpriority. The DEA UC messaged PNWpriority that the funds were sent and PNWpriority then stated “Yessir hit it my bad got a little busy”, “I’ll have that out for ya tomorrow”.

92. On April 12, 2024, the DEA UC messaged PNWpriority for a tracking number. On April 13, 2024, PNWpriority responded to the DEA UC and stated “Yessir got ya”, “Had to put that together for ya”.

93. On April 16, 2024, the DEA UC responded to PNWpriority saying thank you. On April 17, 2024, the DEA UC asked PNWpriority for the tracking number again. On April 18, 2024, the DEA UC messaged PNWpriority for an update. PNWpriority responded to the DEA UC that PNWpriority was on a flight and would send the tracking when PNWpriority landed. PNWpriority also stated that PNWpriority was flying out for “some quick business.”

94. On April 23, 2024, a DEA Special Agent, acting in an undercover capacity, hereafter referred to as DEA UC2, and utilizing the same undercover

account on Telegram, messaged PNWpriority asking for a tracking number regarding the UC purchase. PNWpriority told DEA UC2 that PNWpriority shipper never sent it out, and that it would be sent overnight. On April 24, 2024, DEA UC2 asked PNWpriority for the tracking number again. PNWpriority did not respond.

95. On April 26, 2024, DEA UC2 messaged PNWpriority “bro whats going on?” On the same day PNWpriority responded with a photo of a United States Postal Service (USPS) receipt.

96. On April 29, 2024, the DEA UC saw the photo of the USPS receipt and observed the address of the post office the receipt from was located at 630 NE Killingsworth Street, Portland, OR 97211-3857. The receipt showed a priority small flat rate box that had an expected delivery date for April 29, 2024. The tracking number on the receipt was # 9505 5159 1062 4117 6948 55.

97. On the same day, DEA investigators received the package, which was transported to the DEA office. The DEA UC let PNWpriority know that he had received the package via telegram. PNWpriority then apologized for the delay, and said the DEA UC would be happy with the quality. On the same day, the DEA UC observed the parcel had a tracking number # 9505 5159 1062 4117 6948 55. Investigators observed a US postage paid sticker on the box indicating the package was mailed out of Portland, Oregon on April 26, 2024. The return address indicated was “Mike Reynolds, 6842 NE Sixth Ave., Portland, OR 97211, which is a residential address. Investigators have not found a “Mike Reynolds” associated with that address. Investigators opened the box and found a USPS paper envelope inside.

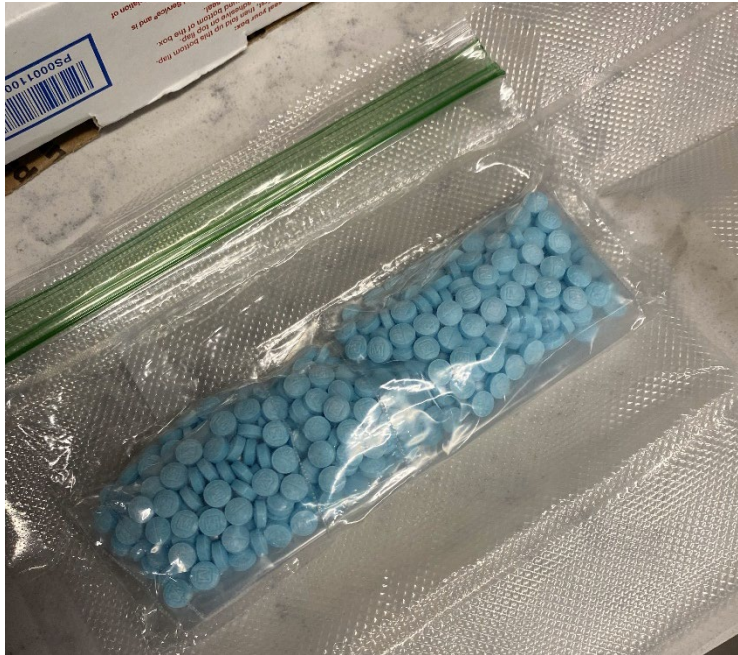
Investigators opened that envelope and found a vacuum sealed bag containing blue circular pills in a clear bag (DEA Exhibit 3). Investigators observed the pills were stamped with “M” and “30”.



A photo of the package containing UC Purchase #3

98. On June 12, 2024, the DEA North Central Laboratory provided a chemical analysis report for Exhibit 3, which indicated the net weight of Exhibit 3 is approximately 55.6 grams and the substance identified was N-Phenyl-N-[1-(2-phenylethyl) -4-piperidinyl] propanamide (Fentanyl) (calc. as Hydrochloride).





A photo of “M30” pills obtained during UC Purchase #3 (DEA Exhibit 3).

**Undercover Purchase #4 – methamphetamine delivered on August 2, 2024.**

99. On July 23, 2024, the DEA UC conducted undercover (UC) conversation on Telegram with PNWPriorty. The DEA UC opened the Telegram chat and observed PNWPriorty had messaged the DEA UC beforehand.

100. During the UC conversation the DEA UC asked PNWPriorty if PNWPriorty had a new menu, referring to a list of drugs available to purchase. PNWPriorty stated that there were a few new products, and the quality was better. The DEA UC asked if the “addys” (counterfeit Adderall) was better, in which PNWPriorty stated, “way better”.

101. PNWPriorty sent the DEA UC a photo of yellow rectangular pills which are suspected Xanax pills. PNWPriorty also sent a video of Adderall pills on a rotating plate. The DEA UC told PNWPriorty that the Adderall pills looked good and

PNWpriority responded saying “Honestly can't tell them apart from script”. Your affiant believes PNWpriority is referring to the quality of these pills are as good as doctor prescribed Adderall and the pills that are available are counterfeit.

102. On July 24, 2024, the DEA UC was in contact with the PNWpriority via Telegram. The agreement for the 500 pills was \$1,600 plus 10% for fees associated with the cryptocurrency transfer. The total for the purchase was \$1,760.00 worth of bitcoin. On this date, an investigator with HSI conducted a transfer to the payment wallet address that the DEA UC received from PNWpriority and transferred 0.02644243 BTC (\$1,762.81) to the deposit address of 3ExFUNkUTvbdIDtiS8SoZqNJpTfBk7f5dV, which is the same address used in previous transactions.

103. On July 30, 2024, DEA UC2 conversed with PNWpriority on Telegram asking for a tracking number on the parcel containing the UC purchase, in which PNWpriority said PNWpriority would look for it.

104. On August 2, 2024, agents from the DEA retrieved a United States Postal Service (USPS) flat rate parcel and the parcel was transferred by agents to the DEA Grand Rapids District Office (GRDO). Agents observed the parcel had a shipping label had the sender information of “Christian NGO, 1925 Alum Rock Ave, San Jose, CA 95116”. The tracking number on the parcel was #9405 5362 0624 8577 6241 55. A database search indicates this address is associated with a strip mall with a few tenants in San Jose, California.

105. Agents then opened the parcel. Upon opening it a paper substance was

used to wrap a silver foil bag. Agents opened the foil and found a black vacuumed sealed bag. Agents then opened the vacuumed sealed bag and found orange oval pills with the stamp markings of “30” and “B794”. Agents then field tested one of the pills and the test concluded a positive result for the presence of methamphetamine. The total weight was 243.3 grams and was processed as DEA Exhibit 4 under the case number assigned to this investigation. On August 6, 2024, DEA Exhibit 4 was sent to the DEA North Central Lab for analysis.

106. On August 5, 2024, the DEA UC conducted undercover (UC) conversation with PNWpriority via Telegram. The DEA UC noticed that on August 2, 2024, PNWpriority messaged the DEA UC stating “Yo the other 2 boats I sent out same day just landed”, “Fwi”, and “Couldn't find the tracking but should be to ya”. The DEA UC responded letting PNWpriority know that the DEA UC received the counterfeit Adderall pills.



**A photo of the suspected methamphetamine pills (counterfeit Adderall pills) obtained during UC Purchase #4 (DEA Exhibit 4).**

**Summary of Evidence Indicating PACKER is PNWpriority**

107. Through the aforementioned DEA interview regarding “Pack in again”, the above Telegram conversation between the Decedent and the user of “Pack In again” on Telegram (i.e., PACKER’s Telegram account), the HSI administrative subpoena to Meta for Instagram user “DK4MERE” showing an email address of [kaipacker12@gmail.com](mailto:kaipacker12@gmail.com) and phone number 503-602-8295 (same as “packoutexotics”), and through the social media research showing photos of Kai PACKER with the moniker of “DK4MERE” on Instagram, I believe that Kai LIVINGSTON PACKER is Instagram user “packoutexotics”, the Telegram user of “Pack In again” , and the Instagram user “DK4MERE”.

108. The UC’s purchases also establish that PACKER is the user of the

Instagram account “packoutexotics” and the administrator of the Telegram group “Pack In again.” The two are linked in that in order to obtain access to the encrypted Telegram messaging group “Pack In again,” a prospective purchaser of narcotics must first establish him or herself by appearing to use drugs and showing they are not law enforcement by sending a video through the Telegram account “Packout40”. Once verified, the UC was given another link to “Pack In again” in order for the UC to discuss the purchase of narcotics.

109. Through UC’s conversations with PACKER’s Telegram, PACKER provides quantities and amounts of the narcotics and does not ask his “source of supply” to provide this information. Through my training an experience, this is not common when an individual is directing a prospective drug purchaser to their source of supply. It also very unusual for a drug dealer to refer one of their customers to their source of supply because it cuts off their sales and extends potential risk to the source of supply by dealing with another individual.

110. When PACKER introduced his source of supply to the UC as telegram user “PNWpriority”, the UC identified similarities with “PNWpriority’s” profile photo that had a United States Postal Service emblem along with "PRIORITY PACKS" next to it. This is the same type of verbiage and advertisement PACKER uses on his Instagram account “packoutexotics”, Snapchat account “mrpackout2.0”, and his Telegram accounts “Pack In again”.

111. When comparing the UC message conversations with PACKER and “PNWpriority” agents note that the writing and verbiage are the same between

PACKER and “PNWpriority”.

112. The UC conducted four controlled purchases for fentanyl and methamphetamines into “PNWpriority”. Of those four controlled purchases, HSI investigator’s paid PACKER’s Coinbase account three times and PACKER’s girlfriend’s (Jayla Sutton’s) Coinbase once. It is illogical for PACKER’s alleged source of supply, “PNWpriority” to accept the risk of selling drugs to a new purchaser (i.e., the DEA UC), only to allow PACKER to be paid for the transaction.

113. Based on my training and experience, it is common for narcotics dealers to attempt to conceal their identity by using multiple aliases in social media and other online platforms. For all of these reasons and based on all of the facts contained in this continuation, I submit “PNWpriority” is Kia Livingston PACKER.

### **CONCLUSION**

114. Based on the above information, there is probable cause to believe that Kai Livingston PACKER committed the following offenses on or about the following dates:

- Distribution of fentanyl and aiding and abetting the same, on or about February 13, 2024, in Ottawa County, in the Southern Division of the Western District of Michigan and elsewhere, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2;
- Distribution of methamphetamine and aiding and abetting the same, on or about March 13, 2024, in Ottawa County, in the Southern Division of the Western District of Michigan and elsewhere, in



violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2;

- Distribution of fentanyl and aiding and abetting the same, on or about April 29, 2024, in Ottawa County, in the Southern Division of the Western District of Michigan and elsewhere, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2; and,
- Distribution of methamphetamine and aiding and abetting distribution of the same, on or about August 2, 2024, in Ottawa County, in the Southern Division of the Western District of Michigan and elsewhere, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C).